

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	Criminal No. 19-257(1) (MJD/KMM)
	)	
v. Plaintiff,	)	
	)	<b>DEFENDANT'S MOTION FOR</b>
AMANDA MARIE LETOURNEAU,	)	<b>HEARING PURSUANT TO <i>FRANKS</i> v.</b>
	)	<b><i>DELAWARE</i></b>
Defendant.	)	

Amanda Marie Letourneau, through undersigned counsel, moves the Court to conduct an evidentiary hearing to examine the statements made in support of the search warrant relied upon to justify the August 28, 2019 search of Ms. Letourneau's home in Danube, Minnesota. As contemplated by *Franks v. Delaware*, a defendant is entitled to such a hearing upon showing that (1) the affidavit contains statements made with a reckless disregard for the truth, or (2) that the affidavit omits "highly relevant" information - both of which would affect a reviewing court's finding of probable cause.

Counsel, on behalf of Ms. Letourneau, is currently conducting an investigation as to the statements made in the search warrant affidavit and intends to separately file a memorandum in support of this motion. Upon filing the memorandum, counsel respectfully requests an opportunity to be heard on this motion at the upcoming hearing, and that the Court allow time for briefing the issue of probable cause before ruling on this motion.

Dated: November 12, 2019

Respectfully submitted,

*s/Shannon Elkins*

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